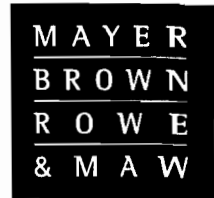


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February 14, 2006

VIA HAND DELIVERY

Ms. Victoria J. Rutson  
Chief, Section of Environmental Analysis  
Surface Transportation Board  
1925 K Street, N.W., Room 504  
Washington, D.C. 20423

Re: Finance Docket No. 34658, The Alaska Railroad Corp. -- Petition For Exemption From 49 U.S.C. §10901 To Construct and Operate a Rail Line Between Eielson Air Force Base (North Pole, Alaska) and Fort Greely (Delta Junction)

Dear Ms. Rutson:

As you are aware, the environmental review in the above-captioned proceeding is being conducted under the STB's rules that provide for use of an independent third party consultant. ICF, Inc. LLC ("Contractor") and several Alaskan firms, including Northern Land Use Research, Inc. ("Subcontractor") were selected by SEA to serve in that capacity. A Memorandum of Understanding was signed between the STB, ICF and the Alaska Railroad Corporation ("ARRC"). That MOU governs the relationship among the parties with respect to the independent contractor relationship including restrictions on other work. Section E of the MOU provides, in pertinent part:

- (1) No employee of Contractor or employee of any subcontractor, who is a part of Contractor's core team committed to the environmental review process for the Petition shall engage in (a) other work for the Applicant, ....
- (2) No other employee of Contractor or other employee of any subcontractor shall, unless SEA is provided prior notice of and approves such work, engage in (a) other work for Applicant, .....

Northern Land Use Research has corresponded with ARRC to seek clarification of the MOU's restriction on other work. As described in the attached letter, Northern Land Use Research has identified the core personnel and their roles/responsibilities on the environmental

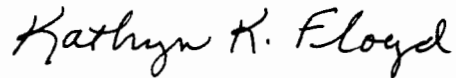
Ms. Victoria J. Rutson  
February 14, 2006  
Page 2

review in this proceeding. Other employees of Northern Land Use Research are identified and their roles/responsibilities for other work for ARRC not related to this proceeding are described.

We respectfully request SEA to approve of such other work for this Subcontractor and its employees. Clarification of the MOU's restriction is necessary because of the limited number of consultants available to conduct environmental and cultural resource work for ARRC with prior Alaskan experience.

Please contact me if you have any questions.

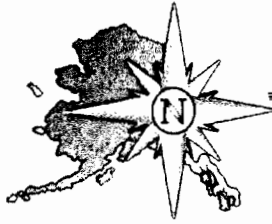
Sincerely,

A handwritten signature in black ink that reads "Kathryn K. Floyd". The script is cursive and fluid.

Kathryn Kusske Floyd

Enclosures

cc: David C. Navecky, SEA (w/enc.)  
Alan Summerville, ICF (w/enc.)  
Eileen Reilly, ARRC  
Brett Flint, AARC



## **NORTHERN LAND USE RESEARCH, INC.**

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600 University Ave. Suite 6 P.O. Box 83990 Fairbanks, Alaska 99708  
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February 8, 2006

Ms. Barbara Hotchkin  
Permits and NEPA Specialist  
Alaska Railroad Corporation  
P.O. Box 107510  
327 Ship Creek Avenue  
Anchorage, AK 99501

Dear Ms. Hotchkin,

This letter serves to describe the organization of Northern Land Use Research, Inc. (NLUR) vis-à-vis services we perform in connection with projects of the Alaska Railroad Corporation (ARRC).

We are the cultural resources subcontractor on the team headed by ICF Incorporated, LLC (ICF), contracted with the Surface Transportation Board ("STB") as Prime Contractor to perform NEPA related services for ARRC's proposal to construct and operate a new rail line from Fairbanks to Fort Greely (Delta), Alaska ("Line Extension Project"). As part of the subcontract agreement between NLUR and ICF, NLUR previously signed a disclosure statement which affirmed that NLUR has no financial interest in the outcome of ARRC's Line Extension Project. Our role for that project, as in all of our projects, is to provide a professional, impartial analysis of data that will be independently reviewed.

For many years, NLUR has provided cultural resources services to ARRC, either directly contracted through a contract/purchase order, or as a third-tier contractor under subcontract to a larger engineering/environmental firm. We wish to continue providing these services to ARRC to assist in meeting its cultural resources responsibilities, primarily those required under the National Historic Preservation Act of 1966 (as amended; NHPA). All of the prior work and anticipated future work elsewhere on the ARRC system is unrelated to the extension project. As in the past, we will continue to perform such services using impartial professional analyses, with all of our work reviewed independently by the Alaska State Historic Preservation Officer (SHPO) and other federal/state agencies as appropriate.

To ensure maximum safeguard of our work quality and neutrality vis-à-vis the three types of projects we perform on ARRC projects (i.e., Line Extension Project as a

subcontractor to ICF, ARRC direct contract NHPA studies, and subcontracted NHPA-related studies for other engineering/environmental firms), we have divided responsibilities of NLUR's core personnel into two divisions: (1) Line Extension Project, managed out of our Fairbanks office and (2) Other ARRC System Projects, managed out of our Anchorage office.

Peter Bowers, MA, RPA, Vice President, and Office Manager of NLUR's main office in Fairbanks, will serve as Project Manager for the Line Extension Project. Ben Potter, PhD, will serve as Senior Project Archaeologist for the Line Extension Project. These individuals will be NLUR key personnel for the Line Extension Project with sole responsibility for staff supervision, making key decisions regarding operations, and interpreting results of studies for this project. For the duration of the ICF NEPA study, Mr. Bowers and Dr. Potter will not work on other ARRC projects.

For the duration of the ICF NEPA study, all ARRC NHPA and ARRC direct contract projects will be under the Project Management of Bruce Ream, MA, RPA, NLUR President and Office Manager of NLUR's satellite office in Anchorage. Mark Cassell, PhD, will serve as Senior Project Archaeologist for ARRC NHPA and ARRC direct contract projects. Mr. Ream and Dr. Cassell will not work on the Line Extension Project. In his role as Principal Investigator for these other projects, Mr. Ream will have sole responsibility for staff supervision, making key decisions regarding operations, and interpreting results of studies for these projects. Finally, lower level NLUR personnel that perform GIS data functions, field work or administrative support may be involved with all ARRC projects as our project schedules and requirements dictate.

We trust this information will be sufficient for purposes of seeking any needed approvals from the STB on restrictions on other work. If you have any questions, please feel free to contact Mr. Bowers (Fairbanks) at (907) 4764-9684, or Mr. Ream (Anchorage) at (907) 276-7475.

Sincerely,



Peter Bowers  
Vice President and Principal Archaeologist